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FILED

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U.S. MAGISTRATE JUDGE

BY _____

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff

vs.

MICHAEL STEVEN SANDFORD,

Defendant

Magistrate No. 2:16-mj-443-GWF

COMPLAINT for violation of
18 U.S.C. § 1752(a)(4) –
Act of Violence on Restricted Grounds

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
Complainant, being duly sworn, deposes and states:

COUNT ONE

(Act of Violence on Restricted Grounds)

On or about June 18th, 2016, in the state and Federal District of Nevada,

MICHAEL STEVEN SANDFORD,

the defendant herein, knowingly attempted to engage in an act of physical violence against Donald J. Trump in the Mystere Theatre in the Treasure Island Casino, Las Vegas, Nevada, a building where Donald J. Trump was receiving protection from the U.S. Secret Service as a result of a temporary visit, by attempting to seize a firearm from Las Vegas Metropolitan Police Department Officer for the purpose of engaging in physical violence against Donald J. Trump, all in violation of Title 18, United States Code, Section 1752(a)(4).

PROBABLE CAUSE AFFIDAVIT

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2 1. Your Complainant is a Special Agent with the United States Secret Service (Secret
3 Service) and is currently assigned to the Las Vegas Field Office. Your Complainant has been
4 employed with the Secret Service since 2011. Prior to becoming a Special Agent and being
5 assigned to the Las Vegas Field Office, your Complainant worked in the United States Air Force
6 Security Forces.

7 2. The information used to support this Complaint was derived from reports of
8 information obtained from eye witnesses to the offenses described herein as well as investigations
9 conducted by law enforcement related to the incident. This Complaint contains information
10 necessary to support probable cause to believe that the criminal offenses described herein were
11 committed by the defendant, **MICHAEL STEVEN SANDFORD (SANDFORD)**, and is not
12 intended to include each and every fact and matter observed by me or known to the Government.
13 Moreover, to the extent that this Complaint contains statements by witnesses, those statements are
14 set forth only in part and in substance and are intended to accurately convey the information, but
not to be verbatim recitations.

FACTS ESTABLISHING PROBABLE CAUSE

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16 3. On June 18, 2016, **SANDFORD** entered a political rally event under protection of the
17 Secret Service located in the Mystere Theatre in the Treasure Island Casino for a political rally
18 attended by Donald J. Trump (Trump), a major candidate for the office of U.S President who is
19 under the protection of the Secret Service. The political rally had one public entrance which was
20 posted with Secret Service Form 4088 posters bearing the Secret Service Star and stating,
21 "ATTENTION: BY ENTERING THIS AREA, YOU ARE CONSENTING TO A SEARCH OF
22 YOUR PERSON AND BELONGINGS," which designated the building or grounds as restricted and
23 under the protection of the Secret Service. Furthermore, this entrance was posted with Secret
service Uniform Division Officers bearing clear Secret Service markings. Guests to this event were

1 processed through magnetometers prior to being allowed entry into the event in order to detect
2 metallic weapons.

3 4. At the rally, uniformed Las Vegas Metropolitan Police Department (LVMPD) Officer
4 Ameel Jacob was stationed at the rally to assist in providing security. An individual later identified
5 as **SANDFORD** approached Officer Jacob, stating that he was seeking an autograph from Trump.
6 **SANDFORD** then attempted to seize the sidearm of Officer Jacob by grabbing the holster and
7 handle of the firearm with both hands in an attempt to remove the firearm from the holster.
8 **SANDFORD** was arrested and on his person was located a United Kingdom Driving License
9 identifying the subject as **SANDFORD**.

10 5. While Special Agent Swierkowski was asking for biographical information,
11 **SANDFORD** stated that he had been in the U.S. for approximately one and a half years.
12 **SANDFORD** lived in Hoboken, NJ upon coming to the U.S. and subsequently traveled to the
13 Ontario/San Bernardino, California area via his personal car (a black, 2007 BMW 328i).

14 6. **SANDFORD** told Special Agent Swierkowski he drove here from California on June
15 16, 2016 to kill Trump. Sandford had seen in the news a few days prior that Trump was coming to
16 Las Vegas to speak. **SANDFORD** then revealed that he made a conscious effort to come to Las
17 Vegas to kill Trump.

18 7. **SANDFORD** said that he went to Battlefield Vegas gun range in Las Vegas on June
19 17, 2016 to learn how to shoot a gun. **SANDFORD** claimed that this was the first time he had ever
20 fired a gun. According to **SANDFORD** he fired 20 rounds from a 9mm Glock pistol for the purpose
21 of learning how to use it.

22 8. **SANDFORD** claimed he targeted Officer Jacobs because he believed he saw the
23 officer's holster in an unlocked position. **SANDFORD** reasoned it would be the easiest way to
acquire a gun to shoot Trump.

9. **SANDFORD** further stated that if he were on the street tomorrow, he would try this

1 again. Sandford claimed he had been planning to attempt to kill Trump for about a year but decided
2 to act on this occasion because he finally felt confident about trying it.

3 10. Special Agent Swierkowski presented **SANDFORD** with a Secret Service Miranda
4 Warning form. **SANDFORD** read the Miranda Warning form and signed it agreeing to speak with
5 us and waive his Miranda rights. I then conducted an interview of **SANDFORD** with Special Agent
6 Swierkowski present. When **SANDFORD** was asked why he attempted to grab Officer Jacob's
7 sidearm, **SANDFORD** replied, "To shoot and kill Trump." **SANDFORD** acknowledged that he
8 would likely only be able to fire one to two rounds and stated he was convinced he would be killed
9 by law enforcement during his attempt on Trump's life. When asked what he would have done had
10 he not made an attempt on Trump's life at this event, **SANDFORD** stated that he had booked tickets
11 for a Trump political rally in Phoenix, AZ and would try again there to kill Trump.

12 11. Upon completion of the interview I reviewed video footage of the incident provided
13 by Treasure Island's audio/visual technicians. The footage shows that at 11:35 a.m. (Pacific
14 Standard Time) **SANDFORD** gets up from his seat at the event, approaches Officer Jacob, and
15 attempts to grab his sidearm.

16 12. LVMPD Detectives Dave Kelly and Daniel New went to Battlefield Vegas gun range
17 and spoke with an employee named J.V. who provided shooting lessons to Sandford on June 17,
18 2016. J.V. recognized **SANDFORD** from his United Kingdom Driving License and stated that
19 **SANDFORD** did fire at his range.

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13. Based on the foregoing facts and information, there is probable cause to believe that **MICHAEL STEVEN SANDFORD** attempted to committed an act of violence on restricted grounds in violation of 18 U.S.C. § 1752(a)(4). *✓*

Special Agent Joseph L. Hall
United States Secret Service

SUBSCRIBED and SWORN to before me

This 20th day of June, 2016.

GEORGE F. FOLEY
UNITED STATES MAGISTRATE JUDGE